

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

LEMOND CYCLING, INC.,

Plaintiff,

v.

TREK BICYCLE CORPORATION,

Defendant and Third-Party
Plaintiff,

v.

GREG LEMON, D,

Third-Party Defendant.

Case No. 08-CV-1010 (RHK-JSM)

DECLARATION OF KRISTAL S.
STIPPICH IN SUPPORT OF
TREK'S MEMORANDUM IN
SUPPORT OF MOTION TO
COMPEL ANDREU TAPE
RECORDINGSTATE OF WISCONSIN)
 :SS.
COUNTY OF MILWAUKEE)

I, KRISTAL S. STIPPICH, declare as follow:

I am an adult resident of the State of Wisconsin and one of the lawyers for defendant and third-party plaintiff Trek Bicycle Corporation ("Trek"). I make this Declaration on personal knowledge and in support of Trek's Memorandum in Support of Motion to Compel Andreu Tape Recording.

1. Attached as Exhibit 1 are true and correct copies of the cover letter and relevant pages from the Privilege Log produced by LeMond on November 26, 2008.

2. Attached as Exhibit 2 is a true and correct copy of a letter dated December 23, 2008 from Denise Rahne to Ralph Weber.

3. Attached as Exhibit 3 are true and correct copies of the cover letter and relevant pages from the Privilege Log produced by LeMond on May 11, 2009.

4. Attached as Exhibit 4 are true and correct copies of the cover letter and relevant pages from the Privilege Log produced by LeMond on July 15, 2009.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 27, 2009.

s/Kristal S. Stippich
Kristal S. Stippich (Wisc. Reg. No. 1061028)
GASS WEBER MULLINS, LLC
309 North Water Street, Suite 700
Milwaukee, WI 53202
Telephone: (414) 223-3300
Fax: (414) 224-6116

ATTORNEY FOR DEFENDANT AND
THIRD-PARTY PLAINTIFF TREK
BICYCLE CORPORATION